



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

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Arnold Schwarzenegger  
Governor

October 20, 2004

Ms. Carolyn Shepherd  
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Mr. Michael J. Cornell  
Lead Remedial Project Manager  
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Naval Facilities Engineering Command  
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### HUMAN HEALTH RISK ASSESSMENT AND SCREENING LEVEL ECOLOGICAL RISK ASSESSMENT, FEASIBILITY STUDY FOR SITE 6, NAVAL AIR WEAPONS STATION, CHINA LAKE, CALIFORNIA

Dear Ms. Shepherd and Mr. Cornell:

During the January 2004 remedial project manager meeting, the Department of Toxic Substances Control (DTSC) and the Navy discussed the resolution of comments for the Site 6 Feasibility Study (FS). The response to state comments on the Human Health Risk Assessment (HHRA) portion of the November 2001 Removal Site Evaluation (RSE), and the Screening Level Ecological Risk Assessment (SLERA) presented as an appendix to the FS were part of that discussion.

DTSC comments on the SLERA portion of the Site 6 FS were provided by Mr. Darrel Lauren. Because Mr. Lauren is no longer with DTSC, the Department of Fish and Game (DFG) was asked to review the Draft Final FS and respond to comments to evaluate whether the concerns identified by DTSC were addressed. The DFG review is included in the attached memorandum dated September 1, 2004. Based upon DFG's input, it appears that there is still disagreement between the state and the Navy on the SLERA methodology. However, DFG indicates that resolution of the ecological risk issues can be dealt with as part of the pre-remedial design, remedial design and post

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remedial monitoring efforts so as not to prevent completion of the remedial actions recommended in the FS. DFG recommends that the SLERA remain in draft form as uncertainty remains regarding the current ecological risks at the site. Once the remedial actions are complete and post-remedial monitoring data is obtained, the SLERA should be revised to incorporate the new data and address the comments provided by DTSC and DFG. DTSC agrees with DFG's recommendation to address these comments as part of the entire pre-remedial design, remedial design and post remedial monitoring efforts.

The Navy reviewed state comments on the HHRA and provided replies in their written response to comments. As agreed by the state and the Navy, the HHRA portion of the RSE will not be revised. Based upon the intended land use the proposed remedy of capping and land use restrictions should prevent human exposures at Site 6. However, the land use restriction should note that the human health risk should be re-evaluated (as presented in the attached memo from the Human and Ecological Risk Division) should the land use change or the cap is to be compromised.

Please note that the additional sampling and analysis planned as part of the remedial design for Site 6 may change the conclusions of the HHRA and SLERA. This possibility should be addressed in the remedial design sampling plan.

If you have any questions, please contact me at (916) 255-3668 or [lracca@dtsc.ca.gov](mailto:lracca@dtsc.ca.gov).

Sincerely,



Laurie Racca, R.G.  
Project Manager  
Office of Military Facilities

Attachment

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